

Cleveland-Cliffs' Requested Changes to Compliance Dates and Emission Limits in the Taconite FIP

Cliffs is requesting changes to requirements found in the FIP that apply to their facilities. Below are the issues that Cliffs has raised and our suggested responses.

Key Issues

Ask #1: Cliffs is requesting a compliance date of May 12, 2021 (an extension of roughly two years) to comply with the FIP limits at UTAC Line 1 because of concerns with pellet quality when firing only natural gas to make standard pellets.

Issue: Since installing its low NO_x burner (LNB) on Line 1 in January 2017, Cliffs has had pellet quality concerns when firing natural gas to make standard pellets. We are concerned that Cliffs has not presented a sufficiently detailed or comprehensive plan to comply with the FIP limits to justify a two-year extension to the compliance date. Further, we are concerned that Cliffs has not provided a viable alternative back-up plan if it continues to experience pellet quality concerns with its current LNB.

Suggested Response:

Ex. 5 Deliberative Process (DP)

Ask #2: Cliffs is requesting a compliance date of May 12, 2021 (an extension of 5 months) to comply with the FIP limits at UTAC Line 2 because of its pellet quality concerns at UTAC Line 1.

Issue: Cliffs asserts that it must first resolve pellet quality concerns at Line 1 before it can develop control options to meet FIP limits at Line 2. We are concerned that Cliffs has neither identified a sufficient problem nor presented a detailed or comprehensive plan to comply with the FIP limits at Line 2 to justify any extension to the compliance date.

Suggested Response:

Ex. 5 Deliberative Process (DP)

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Ask #3: Cliffs is requesting the highest limits in the range of NO_x emission limits for UTAC Line 1 when co-firing natural gas and coal.

Issue: The FIP defaults to the lowest end of the emission limits in the range unless specific additional information is provided that supports a higher limit. Cliffs has not provided the

emission and pellet quality data specified in the FIP to justify a higher limit, nor established that the current LNB was designed as specified in the FIP. Further, it is our understanding that Cliffs may modify the current burner, in which case Cliffs would need to provide new FIP required data for the modified burner.

Suggested Response:

Ex. 5 Deliberative Process (DP)

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Ask #4: Cliffs is requesting a higher than justified NOx emission limit for Line 1 at its Hibbing facility.

Issue: The FIP defaults to the lowest end of the emission limits in the range unless specific additional information is provided that supports a higher limit. Cliffs has not provided the emission and pellet quality data specified in the FIP. Further, Cliffs has introduced a production factor that was not derived by agreed upon procedures found in the FIP.

Suggested Response:

Ex. 5 Deliberative Process (DP)

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Ask #5: Cliffs is requesting higher SO2 limits at Tilden.

Issue: EPA has acknowledged that modifying the FIP SO2 limit based on production capacity and variations in ore sulfur content may be appropriate. Cliffs has provided limited data taken from small time intervals (weekly) representing its highest production and highest ore sulfur content, resulting in a requested emission limit more than four times higher than a limit calculated under FIP-specified procedures. Further, Cliffs has not provided the raw data upon which its requested increased limit is based.

Suggested Response:

Ex. 5 Deliberative Process (DP)